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The Law Offices of SPERO T. LAPPAS  
205 State Street  
Post Office Box 808  
Harrisburg, Pennsylvania 17108-0808  
(717) 238-4286

By: SPERO T. LAPPAS, Esquire  
Pa. Supreme Court identification no. 25745

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CINDY L. RIGG,  
Plaintiff

v.

COUNTY OF DAUPHIN,  
DAUPHIN COUNTY SHERIFF'S  
DEPARTMENT,  
RALPH McALLISTER,  
Defendants

CIVIL ACTION NO. 4:CV-01-0967

JURY TRIAL DEMANDED

(JUDGE RAMBO)✓

FILED

APR 08 2002

PER RB  
HARRISBURG, PA DEPUTY CLERK

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MOTION FOR ENLARGEMENT OF TIME

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1. On March 6, 2002, Defendants, County of Dauphin and Dauphin County Sheriff's Department filed a motion to dismiss Plaintiff's amended complaint.

2. Due to the nature of the subject matter, Plaintiff requests an extension of time until April 12, 2002, to file the

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brief in opposition to Defendants' motion to dismiss.

3. The requested extension of time is brief in duration, it will not unduly delay the adjudication of this matter on the merit, and it will not prejudice any party's substantive rights.

4. James D. Young, Esquire, counsel for Defendants, County of Dauphin and Dauphin County Sheriff's Department, concurs in this request for enlargement of time.

WHEREFORE, Plaintiff respectfully requests this Honorable Court grant this motion for enlargement of time to file a brief in opposition to Defendant's motion to dismiss until April 12, 2002.

RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

By: 

SPERO T. LAPPAS, Esquire  
Pa. Supreme Ct. ID no. 25745  
205 State Street  
P.O. Box 808  
Harrisburg, PA 17108-0808  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CINDY L. RIGG,	:	
Plaintiff	:	CIVIL ACTION NO. 4:CV-01-0967
	:	
v.	:	JURY TRIAL DEMANDED
	:	
COUNTY OF DAUPHIN,	:	
DAUPHIN COUNTY SHERIFF'S	:	
DEPARTMENT,	:	
RALPH McALLISTER,	:	
Defendants	:	(JUDGE RAMBO)

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CERTIFICATE OF CONCURRENCE

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I, Spero T. Lappas, Esquire, do hereby certify that I have obtained the concurrence of James D. Young, Esquire, counsel for Defendants, County of Dauphin and Dauphin County Sheriff's Department in the attached motion for enlargement of time.

RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

By: 

SPERO T. LAPPAS, Esquire  
Pa. Supreme Ct. ID no. 25745  
205 State Street  
P.O. Box 808  
Harrisburg, PA 17108-0808  
(717) 238-4286  
Attorney for Plaintiff

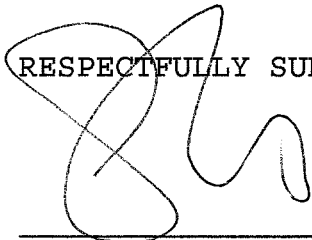
**CERTIFICATE OF SERVICE**

I hereby certify that on this date I served a true copy of the attached document upon the person(s) named below by:

James D. Young, Esquire  
Lavery, Faherty, Young &  
Patterson, P.C.  
225 Market Street, Suite 304  
P. O. Box 1245  
Harrisburg, PA 17108-1245

E. Ralph Godfrey, Esquire  
Metzger, Wickersham, Knauss & Erb, P.C.  
3211 North Front Street  
P. O. Box 5300  
Harrisburg, PA 17110-0300

RESPECTFULLY SUBMITTED,

  
SPERO T. LAPPAS, ESQUIRE  
205 STATE STREET  
HARRISBURG, PA. 17108-0808

DATE: 4/8/02